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20 *Co-Lead Counsel for Plaintiffs*

21  
22 **IN THE UNITED STATES DISTRICT COURT**  
23 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

24 IN RE: UBER TECHNOLOGIES, INC.,  
25 PASSENGER SEXUAL ASSAULT  
26 LITIGATION

27 This Document Relates to:

28 ALL WAVE 1 BELLWETHER CASES

Case No. 3:23-md-03084-CRB (LJC)

STIPULATION AND [PROPOSED] ORDER  
TO RESET PRETRIAL DEADLINES

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6-17<sup>th</sup> Floor

WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1  
Case Assignments and Discovery Schedule;

WHEREAS, Pretrial Order No. 26, which required the parties to exchange expert reports by  
August 8, 2025 and rebuttal expert reports by September 8, 2025, was modified by Stipulation and  
Court Order to require the parties to submit expert reports by August 22, 2025, and rebuttal expert  
reports by September 22, 2025 [ECF 3533]; and was further modified by Stipulation and Court Order

1 to require the parties to submit expert reports by August 29 and rebuttal expert reports by September  
2 29 [ECF 3705];

3 WHEREAS, at the August 22, 2025 Case Management Conference, the Court informed the  
4 parties that the first bellwether trial will begin on January 6, 2026, rather than December 8, 2025 [ECF  
5 3725];

6 WHEREAS, Pretrial Order No. 26 was further modified by Stipulation and Court Order to  
7 require the parties to submit expert reports by September 12, 2025 and rebuttal expert reports by  
8 October 13, 2025 [ECF 3757];

9 WHEREAS, the parties agree that an additional extension of the expert disclosure deadlines is  
10 necessary, and that they will meet and confer on adjustments to the remainder of the pretrial schedule;

11 WHEREAS, given the additional time made available by the new trial date, the parties agree  
12 that pretrial deadlines for the disclosure of expert reports in the five Wave 1 cases that have  
13 substantially completed fact discovery should be modified as follows:

- 14 • Expert Reports: September 26, 2025
- 15 • Rebuttal Reports: October 24, 2025

16 THEREFORE, the parties respectfully request the Court enter the parties' stipulation and  
17 that the following deadlines set by Pretrial Order No. 26 and modified by ECF 3533, 3705, and 3757  
18 be extended as follows:

19 For B.L., A.R.2, Dean, LCHB128, and WHB 823:

- 20 • Expert Reports: September 26, 2025
- 21 • Rebuttal Reports: October 24, 2025

22  
23 **IT IS SO STIPULATED.**

24  
25 DATED: September 10, 2025

Respectfully submitted,

26 By: /s/ Sarah R. London

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26 Dated: September 10, 2025

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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: September 10, 2025

/s/ Sarah R. London

Sarah R. London

**[PROPOSED] ORDER**

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Charles R. Breyer  
United States District Judge